

BUCKS COUNTY LAW DEPARTMENT
 Shae L. Randolph, Assistant County Solicitor
 Attorney I.D. No. 333311
 55 East Court Street, 5th floor
 Doylestown, PA 18901
 (215) 348-6464

Attorney for the County Defendants

**IN THE UNITED STATES DISTRICT COURT FOR THE
 EASTERN DISTRICT OF PENNSYLVANIA**

ROBIN DIGGS,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	Case No. 24-04827
	:	
BUCKS COUNTY, et al.,	:	JURY TRIAL DEMANDED
	:	
Defendants.	:	

**COUNTY DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED
 COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(B)(6)**

Defendants, the County of Bucks (the “County”), Director (“Dir.”) of the Bucks County Department of Corrections (“DOC”), David Kratz; Deputy Dir. James Coyne; Superintendent (“Supt.”) Carl Metellus; Deputy Supt. Kelly Reed; Investigator (“Inv.”) Robert McLeod; Inv. Daniel Onisk; and Captain (“Cpt.”) James Nottingham (collectively, the “Individual County Defendants,” and together with the County, the “County Defendants”), by and through their undersigned counsel, respectfully submit this Memorandum of Law in support of their Motion to Dismiss Plaintiff’s Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(6).

Date: September 11, 2025

BUCKS COUNTY LAW DEPARTMENT

BY: _____

Shae L. Randolph (No. 333311)
Assistant County Solicitor

Attorney for the County Defendants